

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

-----	X	
UNITED STATES SECURITIES	:	
AND EXCHANGE COMMISSION,	:	
	:	
Plaintiff,	:	
v.	:	
	:	
MARLON QUAN, et al.,	:	CIVIL ACTION
	:	0:11-cv-00723-ADM-JSM
Defendants,	:	
	:	
FLORENE QUAN,	:	
	:	
Relief Defendant,	:	
and	:	
	:	
DZ BANK AG DEUTSCHE	:	
ZENTRAL-	:	
GENOSSENSCHAFTSBANK,	:	
FRANKFURT AM MAIN ("DZ	:	
BANK"),	:	
Intervenor,	:	
	:	
SOVEREIGN BANK,	:	
	:	
Intervenor,	:	
and	:	
	:	
GARY HANSEN,	:	
	:	
Intervenor,	:	

**AGREED MOTION TO
EXTEND DISCOVERY DEADLINES**

Plaintiff United States Securities and Exchange Commission and Intervenor
Sovereign Bank jointly move pursuant to Rule 16(b)(4) of the Federal Rules of Civil

Procedure and Minnesota District Local Rule 16.3 to extend the discovery deadlines set in the Pre-Trial Scheduling Order entered on May 10, 2012. (Dkt. No. 159.) as follows:

1. The fact discovery period is extended until January 4, 2013 for the limited purposes of allowing Intervenor Sovereign Bank to complete its production of documents to the SEC.
2. The fact discovery period is extended until January 18, 2013 for the limited purposes of allowing the SEC to take Sovereign Bank's Rule 30(b)(6) deposition.

All parties have agreed to the entry of the attached proposed Order.

Respectfully submitted,

Dated: December 14, 2012

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BANK”),	:	
Intervenor,	:	
	:	
SOVEREIGN BANK,	:	
	:	
Intervenor,	:	
and	:	
	:	
GARY HANSEN,	:	
	:	
Intervenor,	:	

**[PROPOSED] AGREED ORDER GRANTING
EXTENSION OF DISCOVERY DEADLINES**

The above matter came on before the undersigned upon Plaintiff United States Securities and Exchange Commission’s (“SEC”) and Intervenor Sovereign Bank’s Joint

Rule 16(b) Motion For Extension of Discovery Deadlines. All parties have agreed to the entry of this Order.

The Court, being duly advised in the premises, upon all of the files, records and proceedings herein, now makes and enters the following Order.

IT IS HEREBY ORDERED THAT:

1. The Agreed Motion for Extension of Discovery Deadlines is granted.
2. The fact discovery period is extended until January 4, 2013 for the limited purposes of allowing Intervenor Sovereign Bank to complete its production of documents to the SEC.
3. The fact discovery period is extended until January 18, 2013 for the limited purposes of allowing the SEC to take Sovereign Bank's Rule 30(b)(6) deposition.

Dated: December ____, 2012

BY THE COURT:

The Honorable Janie S. Mayeron
United States Magistrate Judge